

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

I, MICHAEL R. KURKJIAN, Special Agent of the Federal Bureau of Investigation, United States Department of Justice, hereinafter referred to as Affiant, being duly sworn on oath, hereby deposes and states as follows:

INTRODUCTION

1. Affiant is an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7) and Federal Rule of Criminal Procedure 41(a)(2)(C), as a Special Agent (SA) of the Federal Bureau of Investigation (FBI). Affiant is empowered to conduct investigations of and to make arrests for federal offenses. *See* 18 U.S.C. § 3052.

2. Affiant has been employed by the FBI since August of 2010, and has been assigned to the investigation of violent and organized crime matters in the Cleveland Division since January of 2013. Affiant has been responsible for the investigation of federal crimes involving drugs, money laundering, interstate transportation of stolen property, weapons violations, and other general criminal offenses in the Northern District of Ohio. At all times during the investigation described in this Affidavit, Affiant has acted in an official capacity as a Special Agent of the FBI.

3. Affiant has participated in all of the usual methods of investigation, including, but not limited to, physical surveillance, the questioning of witnesses, and the analysis of evidence. Affiant has drafted and executed arrest and search warrants resulting in the seizure of illegal weapons, drugs, and stolen property. Affiant has supervised the activities of informants and participated in the execution of consensual monitoring and court-ordered Title III wiretaps.

4. This Affidavit is offered in support of an arrest warrant for MARK A. LLOYD

for two counts of armed bank robbery in violation of Title 18, United States Code, Section 2113(a) and (d).

5. The statements contained in this Affidavit are based in part on information developed by other SAs of the FBI and Officers and Detectives of the Cleveland Police Department (CPD) who aided in the investigation of the robberies. Unless otherwise noted, whenever in this Affidavit your Affiant asserts that a statement was made, the information was provided by another law enforcement officer or an investigator (who may have had either direct or hearsay knowledge of the statement) to whom your Affiant has spoken or whose report your Affiant has read and reviewed. Likewise, any information pertaining to vehicles and registrations, personal data on subjects, and record checks, has been obtained through the Law Enforcement Automated Data System (LEADS), various state driver's license motor vehicle records, online database searches or the National Crime Information Center (NCIC) computers, and various open source databases such as LexisNexis.

6. Because this Affidavit is being submitted for the limited purpose of supporting the application in this matter, Affiant has not included each and every fact known to him concerning this investigation. Affiant has set forth only the facts that he believes are necessary to establish the probable cause for the issuance of the arrest warrant sought.

FACTS AND CIRCUMSTANCES REGARDING PROBABLE CAUSE

A. January 30, 2017: Ohio Savings Bank Robbery

7. On January 30, 2017, Affiant, Agents/Task Force Officers (TFOs) of the FBI Violent Crime Task Force (VCTF), and Officers and Detectives of the CPD responded to the report of a bank robbery that occurred at the Ohio Savings Bank (OSB) located at 1866 West 25th Street, Cleveland, Ohio. This location is within the Northern District of Ohio, Eastern Division.

8. Through personal experience and through confirmation by Loss Prevention for OSB, Affiant is aware that deposits of OSB were, at the time of the robbery, and remain, insured by the Federal Deposit Insurance Corporation (FDIC).

9. Investigation revealed that the OSB robbery was committed as follows:

10. On January 30, 2017, at approximately 1:10 p.m., an unknown black male (UNSUB) entered the OSB and approached the lone teller at the teller counter. UNSUB asked the teller about opening a checking account. The teller described UNSUB as appearing nervous. As the teller began to tell UNSUB about the process, UNSUB passed a piece of paper to the teller and verbally demanded for the teller to “just give me the money and I won’t hurt you.” The teller looked at the piece of paper and observed handwriting on it. The teller read the handwriting, which stated, “Give me 2,500 in cash and I will not shoot you.” After reading the piece of paper, the teller looked up at UNSUB when she observed UNSUB lift up the front part of his shirt, exposing his waistline. The teller observed the handle of what appeared to be a black semi-automatic pistol in UNSUB’s waistband. The teller, knowing that a robbery was occurring and in fear for her life, complied with UNSUB’s demands and began emptying the contents of her top teller drawer. The teller then handed the money to UNSUB, who in turn took the money and put the money into one of his pants pockets. UNSUB then stated loudly, “Alright, I’ll be

back to open up a checking account,” and turned towards the front entrance and began walking across the lobby floor, exiting the same front entrance from which UNSUB originally entered the bank.

11. The teller described UNSUB as having a “misshapen” gun tattoo, in black filled-in ink, underneath UNSUB’s right eye.

12. A post robbery audit conducted by OSB bank employees identified a loss from the robbery in the amount of approximately \$918.25 in United States currency.

13. The demand note was collected and recovered by CPD Scientific Investigative Unit (SIU) who arrived on scene after being notified of the bank robbery. Before CPD SIU’s departure, Affiant observed and photographed the demand note. The demand note was written on the bottom portion of a torn piece of paper, with a brown border surrounding the edges of the paper. Affiant confirmed that the demand note read, “Give me 2,500 in cash and I will not shoot you.”

14. On January 30, 2017, a review by Affiant of still surveillance photographs from OSB’s internal surveillance cameras for the time of the robbery depicted UNSUB as a black male, wearing a dark-colored long sleeve turtle neck, blue jeans, black sneakers with white portions, and a gold ring on his right hand.

15. On January 30, 2017, Affiant learned from CPD that witnesses described that a male, matching the description of UNSUB, ran towards Bridge Avenue, directly northeast of the bank. On January 30, 2017, a review of video surveillance footage by Affiant from Nano Brew’s surveillance cameras, located at 1859 West 25th Street, Cleveland, Ohio, showed UNSUB running northeast on Bridge Avenue and then turning north, running into the rear parking lot of Riverview, a Cuyahoga Metropolitan Housing Authority (CMHA) high rise property, located at

1745 West 25th Street, Cleveland, Ohio. A canvas of the area and building was negative for UNSUB.

B. February 13, 2017: PNC Bank Robbery

16. On February 13, 2017, Affiant, Agents/TFOs of the FBI VCTF, and Officers and Detectives of the CPD responded to the report of a bank robbery that occurred at the PNC Bank, located at 1941 West 25th Street, Cleveland, Ohio. This location is within the Northern District of Ohio, Eastern Division.

17. Through personal experience and through confirmation by Loss Prevention for PNC Bank, Affiant is aware that deposits of PNC Bank were, at the time of the robbery, and remain, insured by the FDIC.

18. Investigation revealed that the PNC Bank robbery was committed as follows:

19. On February 13, 2017, at approximately 11:22 a.m., an unknown black male (UNSUB) entered the PNC Bank, approached the teller counter, and climbed over the teller counter to the teller side. PNC Bank employees observed UNSUB brandishing what appeared to be a black semi-automatic pistol as UNSUB climbed over the teller counter. UNSUB asked a teller (Teller #1), "Where's the money?" Teller #1 did not immediately respond. At that time, a second teller (Teller #2), who was also behind the teller counter, told UNSUB that the money was in the teller drawers. UNSUB demanded that Teller #1 open the locked teller drawer. Teller #1, knowing that a robbery was occurring and in fear for her life, unlocked her teller drawer. UNSUB then took the currency located in the teller drawer and placed the money into a plastic convenience store bag with "Thank You" written in red print. UNSUB then turned to Teller #2. Teller #2, also knowing that a robbery was occurring and in fear for her life, had taken currency out her teller drawer and placed the money onto the teller counter while UNSUB had been taking

the money from Teller #1's drawer. UNSUB took the money laid out by Teller #2 and placed the money into the same plastic bag. UNSUB then walked around the teller counter, entered the lobby floor, and exited through the front entrance, fleeing from the bank on foot in an unknown direction.

20. Teller #1 described UNSUB as having a tattoo on UNSUB's right cheek.

21. A post-robbery audit conducted by PNC Bank employees identified a loss from the robbery in the amount of \$4,238.00 in United States currency.

22. On February 13, 2017, PNC Bank employees provided register sheets for the bait money maintained by the bank. Affiant is aware that banks will often record certain serial numbers from U.S. currency, commonly referred to as "bait bills," and maintain a record of those serial numbers for the purpose of identifying currency taken from their institution.

23. On February 13, 2017, a review of still surveillance photographs from PNC Bank's internal surveillance cameras for the time of the robbery by Affiant identified UNSUB as appearing to be the same UNSUB who had previously robbed the OSB on January 30, 2017. UNSUB appeared to be a black male, wearing a black long sleeve top, dark colored jeans, red sneakers, and a gold ring on his right hand.

24. On February 13, 2017, a canvas for video surveillance across the street from PNC Bank and nearby on West 25th Street to determine UNSUB's direction of travel after the bank robbery was negative.

25. On February 13, 2017, Affiant, along with CPD, went to the Nano Brewery, located at 1859 West 25th Street, Cleveland, Ohio, to determine if UNSUB had fled in the same direction as he previously had after the January 30, 2017 OSB robbery. Affiant and CPD, in reviewing Nano Brewery's surveillance cameras, observed a male, with red shoes, running

quickly across Bridge Avenue, towards the Riverview CMHA high rise property, located at 1745 West 25th Street, Cleveland, Ohio. A check of the parking lot and lobby area of the building was negative for UNSUB.

C. Identification of MARK LLOYD

26. On January 31, 2017, Affiant received a tip regarding the identity of the OSB robber. FBI Cleveland had distributed photographs from the OSB bank surveillance cameras to media outlets. The tipster advised that the UNSUB depicted in photographs appeared to resemble “Mark Lloyd” or “Michael Lloyd.” The tipster advised that the Lloyds are twin brothers who are African American, have short hair, and are approximately 5’9” tall.

27. On January 31, 2017, Affiant queried the Ohio Law Enforcement Gateway (OHLEG) for “Mark Lloyd” and “Michael Lloyd.” Affiant located the two individuals described by the tipster in a database of state-issued identification cards. Affiant observed MARK LLOYD’s most recent Ohio driver’s license photograph, issued on September 18, 2015, wherein the individual depicted has a tattoo underneath his right eye. Affiant also observed Michael Lloyd’s most recent Ohio driver’s license photograph, issued on December 18, 2015, wherein the individual depicted has a tattoo underneath his right eye.

28. On January 31, 2017, Affiant queried FBI Cleveland NCIC to run “Michael Lloyd” and “Mark Lloyd” for criminal histories and outstanding warrants. Affiant learned that MARK LLOYD had prior convictions for robbery, abduction, and aggravated assault, as well as active local warrants for aggravated robbery. Affiant learned that Michael Lloyd had prior convictions for robbery and felonious assault and no outstanding warrants. Affiant further learned that Michael Lloyd currently had an active Florida License, issued on June 1, 2016 and an active current address of 2107 N. Dixie Highway, West Palm Beach, Florida.

29. On February 3, 2017, Affiant requested the FBI West Palm Beach Resident Agency (RA) query Florida Department of Motor Vehicles for Michael Lloyd. An FBI Agent from the FBI West Palm Beach RA provided Affiant with a color license photograph depicting Michael Lloyd. The individual depicted in the Florida driver's license photograph, issued on June 1, 2016, did not depict Michael Lloyd as having a tattoo underneath his right eye. The FBI Agent from FBI West Palm Beach RA provided Affiant with a current address of 2107 N. Dixie Highway, West Palm Beach, Florida for Michael Lloyd.

30. After receiving the information from FBI West Palm Beach RA, Affiant believed that Mark Lloyd was using an Ohio driver's license in Michael Lloyd's name, but with MARK LLOYD's picture. Based on Affiant's training and experience, criminals will sometimes use another person's identification to avoid law enforcement or, in the alternative, to be able to provide law enforcement with false identification in the hopes that law enforcement will not ascertain their true identity. Many times, criminals will use a family member's identification because of easy access to the identification, personal knowledge of the individual, and the physical resemblance between the criminals and the identification photographs of their family members.

31. On February 13, 2017 and February 14, 2017, CPD administered photo arrays to PNC and OSB employees that were present during the January 30, 2017 OSB robbery and February 13, 2017 PNC Bank robbery which contained MARK LLOYD's photograph. The photo arrays were administered pursuant to CPD policies and procedures, with the following results:

- a. The OSB employee present during the January 30, 2017 OSB robbery identified MARK LLOYD as the bank robber.

- b. Teller #1 at PNC Bank and another employee who was present during the February 13, 2017 PNC Bank robbery identified MARK LLOYD as the bank robber. Teller #2 and another PNC Bank employee did not identify MARK LLOYD as the bank robber.

32. On February 14, 2017, after consultation by CPD with the Cuyahoga County Prosecutor's Office, warrants for MARK LLOYD were issued charging MARK LLOYD with two (2) counts of aggravated robbery in connection with the January 30, 2017 OSB and February 13, 2017 PNC Bank robbery.

D. Arrest of MARK LLOYD

33. On February 17, 2017, Affiant and an Agent of the FBI VCTF responded to Cleveland City Hall, located at 601 Lakeside Avenue East, Cleveland, Ohio, to a report of an individual detained by CPD that matched the description of MARK LLOYD.

34. Upon arrival, Affiant and the other FBI VCTF Agent met with CPD officers who were with the detained person. Upon observing the detained person, Affiant believed he resembled MARK LLOYD, and Affiant observed a tattoo underneath the individual's right eye.

35. Affiant asked the person his name, and he replied, "Mike." CPD advised that the individual had an Ohio driver's license on him identifying him as "Michael Lloyd." When Affiant asked the individual if his name was "Mark," the individual replied that his name was "Michael Lloyd." When asked by Affiant where his brother "Mark" was located, the individual replied, "In Florida." Affiant then advised the detained person that he resembled MARK LLOYD and that a portable fingerprint biometric device, commonly referred to as a "Quick Capture Platform" or "QCP," would be brought to the location where FBI Agents and CPD were to assist in identifying him.

36. On February 17, 2017, an Agent of the FBI VCTF brought a portable fingerprint biometric device to City Hall, and the detained person's fingerprints were taken. Those fingerprints matched the fingerprints on file for MARK LLOYD. MARK LLOYD was advised that he was under arrest pursuant to local active warrants and transported by Affiant and an Agent from the FBI VCTF to the FBI Cleveland Division, located at 1501 Lakeside Avenue, Cleveland, Ohio.

E. First Interview of MARK LLOYD

37. On February 17, 2017, after his arrest, MARK LLOYD was interviewed by Affiant and an Agent from the FBI VCTF, at the FBI Cleveland Division, located at 1501 Lakeside Avenue, Cleveland, Ohio. The interview was audio and video recorded.

38. Before the interview, Affiant advised MARK LLOYD of his constitutional rights pursuant to an FBI FD-395 Advice of Rights form. MARK LLOYD advised that he would "wait for his attorney" and did not want to speak to the interviewing Agents. Affiant provided MARK LLOYD with his business card if he decided that he would like to speak to Affiant at a later time. The interview was concluded.

39. Before being transported, Affiant collected from MARK LLOYD his personal possessions, which included, among other things, the following: a cellular telephone; a receipt for jewelry purchased on February 17, 2017; a gold chain; \$245.00 in United States currency; a key with an orange plastic label, which read "314"; a gold ring with "DAD" inscribed on top, which MARK LLOYD had been wearing on his right hand; an Ohio driver's license in the name "Michael Lloyd"; and RTA cards.

40. MARK LLOYD was then transported to the Cuyahoga County Jail to be booked on the active local warrants by an Agent and TFO of the FBI VCTF.

F. Second Interview of MARK LLOYD

41. On February 17, 2017, after MARK LLOYD had departed the FBI Cleveland Division, Affiant received a cellular telephone call from the Agent who was transporting MARK LLOYD. The Agent advised that MARK LLOYD had decided that he wanted to speak to Affiant. MARK LLOYD, after being provided time to smoke a cigarette, was then brought back to the FBI Cleveland Division.

42. After his return to the FBI Cleveland Division, MARK LLOYD was again interviewed by Affiant and the same Agent from the FBI VCTF. The interview was audio and video recorded.

43. Before the interview, Affiant again provided MARK LLOYD with his constitutional rights pursuant to an FBI FD-395 Advice of Rights form. MARK LLOYD advised that he was willing to speak to the interviewing Agents without an attorney present and memorialized the same with his signature on the FBI FD-395 Advice of Rights form in the presence of Affiant and the Agent of the FBI VCTF.

44. MARK LLOYD stated the following about the January 30, 2017 OSB robbery:

- a. MARK LLOYD stated that, before the robbery, he was on West 25th Street, Cleveland, Ohio, near houses located behind West 25th Street, Cleveland, Ohio.
- b. MARK LLOYD stated that he saw the bank and decided to rob it.
- c. MARK LLOYD stated that he went into the OSB, gave the teller a “note” and told the teller to “give me some money and stuff.” MARK LLOYD further stated that he also showed the teller a BB gun. MARK LLOYD described the BB gun as black in color. MARK LLOYD advised that the BB gun was located inside of the room he was renting at “McCall’s” in East Cleveland (identified as McCall’s

Motor Inn, located at 14660 Euclid Avenue, East Cleveland, Ohio). MARK LLOYD stated that he took the RTA to get from East Cleveland to West 25th Street on January 30, 2017.

- d. MARK LLOYD advised that, after he received the money from the teller, he ran to the CMHA building located on West 25th Street, Cleveland, Ohio (identified as CMHA Riverview, 1745 West 25th Street, Cleveland, Ohio). MARK LLOYD stated that he entered the back entrance of the building.
- e. MARK LLOYD estimated that he received approximately \$700.00 in United States currency from the robbery.
- f. MARK LLOYD advised after waiting in the CMHA building, he took the RTA back to McCall's Motor Inn in East Cleveland, Ohio.
- g. MARK LLOYD identified himself as the individual in the OSB robbery bank surveillance photograph dated January 30, 2017.
- h. MARK LLOYD stated that he robbed the bank because he couldn't obtain employment due to a prior kidnapping charge.

45. MARK LLOYD stated the following about the February 13, 2017 PNC Bank robbery:

- a. MARK LLOYD stated that on February 13, 2017, he took the RTA from McCall's Motor Inn to West 25th Street, Cleveland, Ohio. MARK LLOYD stated that, before the robbery, he went to the CMHA Riverview building located on West 25th Street, Cleveland, Ohio.
- b. MARK LLOYD advised that he left the CMHA Riverview building and was walking around on West 25th Street, Cleveland, Ohio, when he saw the PNC Bank

and decided to rob it. MARK LLOYD further stated that he chose the West 25th Street area to commit the bank robberies because he was familiar with the area from previously staying at a group home on Archwood Avenue, Cleveland, Ohio, approximately five minutes away.

- c. MARK LLOYD stated that he went into the PNC Bank, jumped over the counter, and asked them to “open up the register and stuff.” MARK LLOYD stated that he had the black BB gun that he had used during the commission of the OSB robbery on January 30, 2017, in his hand as he jumped over the counter. He further stated that, once over the counter, he took the money from the teller drawers and left the PNC Bank.
- d. MARK LLOYD stated that he again went to the CMHA Riverview building and waited approximately 30 minutes before leaving the area. MARK LLOYD stated that he then took the RTA back to McCall’s Motor Inn in East Cleveland.
- e. MARK LLOYD estimated that he received approximately \$4,000.00 in United States currency from this robbery.
- f. MARK LLOYD identified himself as the individual in the PNC Bank robbery bank surveillance photographs dated February 13, 2017.
- g. MARK LLOYD advised that the clothing, BB gun, and approximately \$2,500 in United States currency left from the bank robberies were located inside of his room at McCall’s Motor Inn, East Cleveland.
- h. MARK LLOYD advised that he was the only person staying in his room at McCall’s Motor Inn, East Cleveland, and he had rented the room through March 4, 2017, using proceeds from the bank robberies.

- i. When asked about his brother Michael Lloyd, MARK LLOYD stated that he did not know where Michael Lloyd was and had not spoken to him in a while. MARK LLOYD confirmed that Michael Lloyd does not have a tattoo underneath his right eye; MARK LLOYD is the only member of his family that has such a tattoo. MARK LLOYD stated that he had been using Michael Lloyd's identification since approximately 2015. MARK LLOYD identified himself as the individual depicted in the photograph on the 2015 Ohio driver's license in Michael Lloyd's name. MARK LLOYD confirmed that he went to City Hall on February 17, 2017, to obtain a certified copy of Michael Lloyd's birth certificate. MARK LLOYD advised that Michael Lloyd was not aware that MARK LLOYD was using identification in Michael Lloyd's name.
- j. Affiant showed MARK LLOYD a Florida driver's license photograph of Michael Lloyd with no identifying information. MARK LLOYD identified the male depicted in the photograph as his brother, Michael Lloyd. The Florida driver's license photograph, issued in 2016, does not depict Michael Lloyd as having a tattoo underneath his right eye.
- k. MARK LLOYD advised that the gold chain he was previously wearing, taken by Affiant after the conclusion of his first interview, was bought with proceeds from the bank robberies.
- l. Before the conclusion of the interview, MARK LLOYD wrote an apology letter to the tellers from the OSB and PNC Bank robberies to show his remorse for committing the bank robberies.
- m. Before the conclusion of the interview, MARK LLOYD provided consent for the

FBI to search his room at McCall's Motor Inn, East Cleveland, Ohio. MARK LLOYD, in the presence of Affiant and the FBI Agent of the VCTF, signed an FBI FD-26 Consent to Search form, authorizing the FBI to search his room.

G. Consensual Search of Room 314, McCall's Motor Inn

46. On February, 17, 2017, pursuant to the signed FD-26 Consent to Search form, Affiant and another Agent of the FBI VCTF went to McCall's Motor Inn, room 314, located at 14660 Euclid Avenue, East Cleveland, Ohio. MARK LLOYD was transported to McCall's Motor Inn in a separate vehicle and remained on scene during the authorized search if he wished to revoke or limit the scope of the consent he previously provided the FBI to search his room. MARK LLOYD advised that key for this room was the key with the orange plastic "314" tag that had been taken by Affiant during the first interview of MARK LLOYD.

47. Affiant recovered the following items relating to the January 30, 2017, OSB robbery and February 13, 2017, PNC Bank robbery from MARK LLOYD's motel room, room 314:

- a. \$2,479.00 in United States currency;
- b. A black "Black Ops" BB gun;
- c. A Hi-Point 9mm firearm, loaded, with five (5) rounds of ammunition;
- d. Two (2) additional rounds of 9mm ammunition;
- e. Two (2) pairs of dark jeans;
- f. One (1) black long sleeve shirt;
- g. One (1) pair of black sneakers;
- h. One (1) pair of red sneakers;
- i. One (1) piece of torn paper with brown border (top portion); and

j. Paperwork in the name of “Michael Lloyd.”

48. The evidence was taken by Affiant to the FBI Cleveland Division and was secured before entering the evidence into FBI Cleveland evidence control.

H. Identification of “Bait Bills”

49. On February 20, 2017, Affiant and a TFO of the FBI VCTF retrieved the \$2,479.00 in United States currency seized during the consensual search of MARK LLOYD’s motel room at McCall’s Motor Inn, East Cleveland, Ohio on February 17, 2017.

50. On February 20, 2017, Affiant compared the serial numbers and issuing Federal Reserve banks on the \$2,479.00 in United States Currency seized from MARK LLOYD’s motel room with the serial numbers listed on the register sheets provided to the FBI by PNC Bank employees on February 13, 2017. In doing so, Affiant identified the following bills seized in the search as “bait bills” from the PNC Bank location robbed on February 13, 2017:


Denomination	Serial Number	Bank of Issue	Series Year
\$50.00	JF40118737A	Chicago	2009
\$50.00	ED10302462A	Cleveland	2004
\$50.00	ED09009239A	Cleveland	2004
\$50.00	EA07479230A	Unknown	2004

CONCLUSION

51. Based on the foregoing facts, your Affiant respectfully submits that probable cause exists to believe that, on January 30, 2017, MARK A. LLOYD did, by force, violence, and intimidation, take from the victim tellers bank monies belonging to, or in the care, custody, control, or possession of, Ohio Savings Bank, located at 1866 West 25th Street, Cleveland, Ohio, in the Northern District of Ohio, Eastern Division, the deposits of which were then insured by the


FDIC, and in so doing, assaulted persons and put in jeopardy the life of persons by the use of a dangerous weapon, in violation of Title 18, United States Code, Section 2113(a) and (d).

52. Based on the foregoing facts, your Affiant respectfully submits that probable cause exists to believe that on February 13, 2017, MARK A. LLOYD did, by force, violence, and intimidation, take from the victim tellers bank monies belonging to, or in the care, custody, control, or possession of, PNC Bank, located at 1941 West 25th Street, Cleveland, Ohio, in the Northern District of Ohio, Eastern Division, the deposits of which were then insured by the FDIC, and in so doing, assaulted persons and put in jeopardy the life of persons by the use of a dangerous weapon, in violation of Title 18, United States Code, Section 2113(a) and (d).



Michael R. Kurkjian
Special Agent
Federal Bureau of Investigation
Cleveland, Ohio

Subscribed and sworn to before me this 23rd day of February, 2017.



Jonathan D. Greenberg
United States Magistrate Judge

